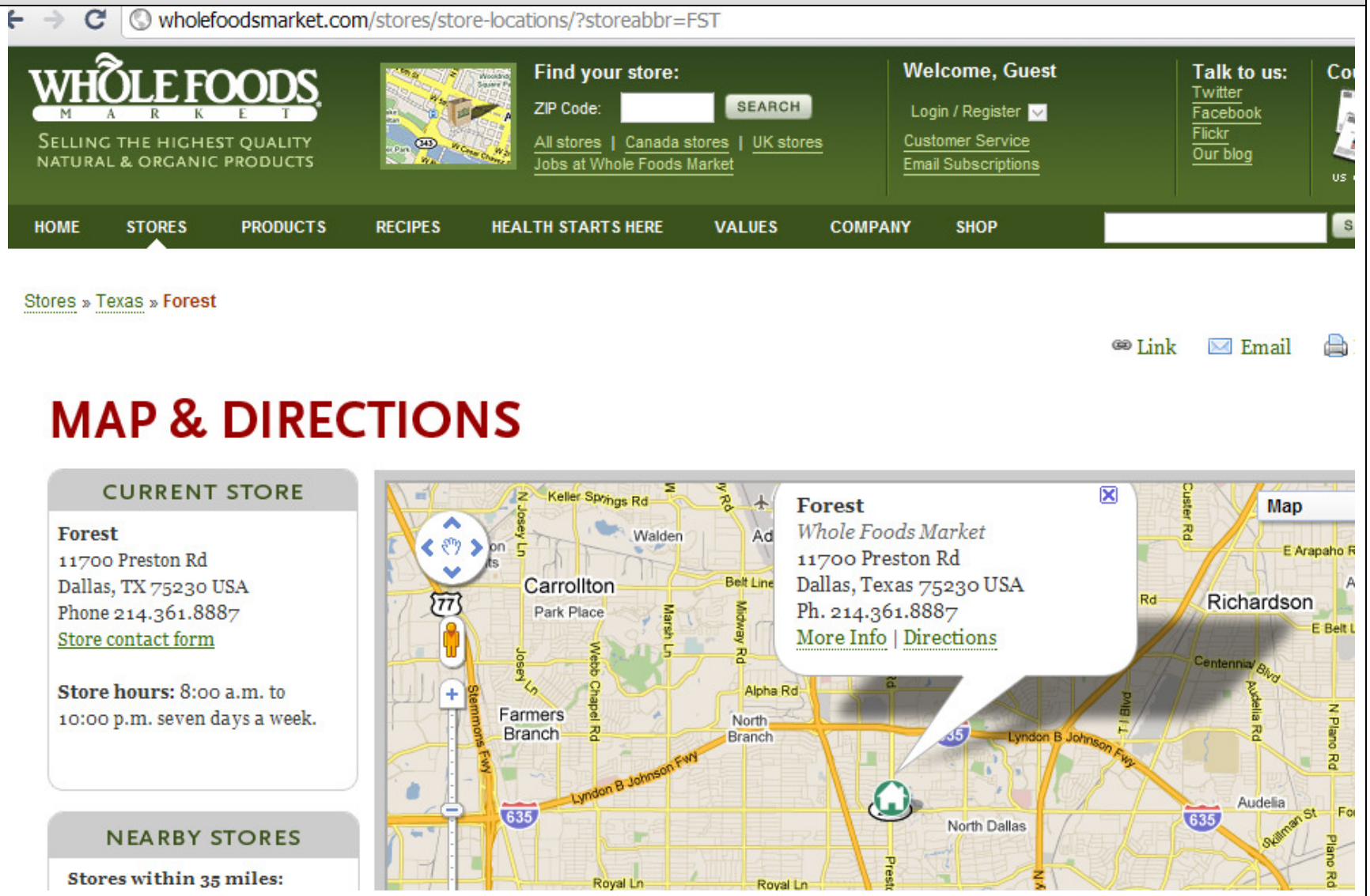
EXHIBIT C

Whole Foods Store Locator Infringes U.S. Pat No. 6,091,956

This document shows where the Whole Foods Market ("Whole Foods") Store Locator (http://wholefoodsmarket.com/stores/, visited on 6/25/2011) infringes claim 11 of U.S. Pat No. 6,091,956. This chart is preliminary, and LBS Innovations LLC ("LBSI") expects to supplement the chart once discovery has been obtained from Whole Foods. LBSI expects this supplement to establish that the inferences contained in this preliminary chart are correct.

Reservation of Rights: Based on currently available information, LBSI believes that the Whole Foods Store Locator literally infringes at least claim 11 of U.S. Pat. No. 6,091,956. LBSI expressly reserves the right to amend its infringement contentions as to Whole Foods to include claims of infringement of other claims of U.S Pat. No. 6,091,956 and/or claims of infringement under the doctrine of equivalents once discovery has been obtained and/or once the Court has construed the terms of the claims of the asserted patent.

U.S. Pat No. 6,091,956	**Whole Foods Store Locator**
11. A method of communicatively executing, including making apparent to the aural and tactile senses of the user, one or more transmittable mappable hypertext items representing people, organisms, and objects, including buildings, roads, vehicles, and signs, on a computer in a manner scalably representing interrelationships of said objects,	LBSI contends that the preamble is not a limitation. In the event the preamble is found to be a limitation on the claim, the Whole Foods Store Locator performs the limitations of the preamble. The Whole Foods Store Locator communicates transmittable hypertext items representing objects (e.g., store locations) to users. The locations are shown on scaled maps that show the relative position of these locations with respect to a location specified by the user. *See, e.g.*, the following screenshot showing various mapped locations.

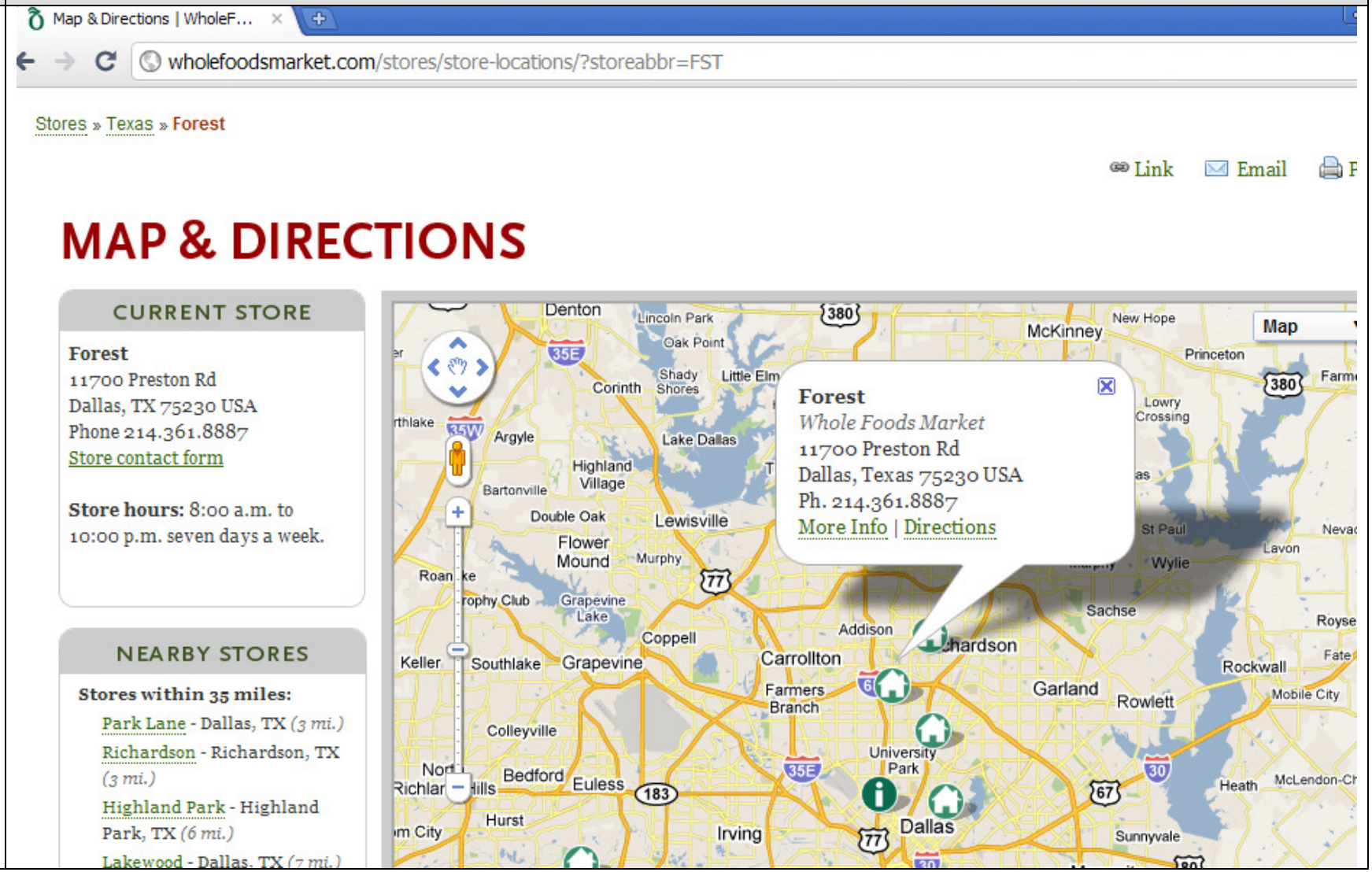
U.S. Pat No. 6,091,956	Whole Foods Store Locator
comprising the steps of:	

U.S. Pat No. 6,091,956	Whole Foods Store Locator
a. searching each of one or more unique mappable information code sequences, each of which said code sequences serving to uniquely represent one of said items and copied from the memory of said computer or received from an alternate source, for a field containing geographical coordinates, said each of said code sequences includes an item reference field, a name field, a location field including said geographical coordinates, and a data field,	The Whole Foods Store Locator performs the step of "searching each of one or more unique mappable information code sequences, each of which said code sequences serving to uniquely represent one of said items and copied from the memory of said computer or received from an alternate source, for a field containing geographical coordinates, said each of said code sequences includes an item reference field, a name field, a location field including said geographical coordinates, and a data field." When the user enters search criteria (e.g., a zip code) and clicks the "Search" button in the above web form, a database of unique mappable information code sequences is searched based on the user-entered search criteria. The user-entered search criteria in this example are locations near the zip code 75229. Each entry in this database of stores is a unique mappable information code sequence, because each entry contains information about the location to which it corresponds, including geographical coordinates, which allow the location to be shown on the map. LBSI believes the Whole Foods Store Locator searches a database of unique mappable information code sequences corresponding to locations for at least the following reasons. The publicly-available code for the Whole Foods Store Locator shows that it contains a number of elements that are populated with information about particular Whole Foods locations. An example entry from the map for one of the Whole Foods locations identified in the map above is excerpted below. ""Store Location","iconfolder":"store","categorynumber":7,"status":1,"tlc":"LCC"},{"lat":"32.907731","lng":"-96.803928","label":"Forest","location":"Whole Foods Market","products":"<p>11700 Preston Rd<br\/>Dallas, Texas 75230 USA<br\/>Ph. 214.361.8887<br\/>" This example shows that a database entry for a location contains, "an item reference field, a name field, a location field including said geographical coordinates, and a data field." The following list identifies exemplars for each of these fields: • An item reference field: Presumably, each location includes an identifier, e.g., a database record number, a location number, etc. Each location also includes a unique value for the variable "categorynumber" (e.g., "categorynumber":7") • A name field: ""label":"Forest"" • A location field including said geographical coordinates: " "},{"lat":"32.907731","lng":"-96.803928"" • A data field: "Ph. 214.361.8887" (one of several data fields). The Whole Foods Store Locator presumably runs a search by comparing the user-entered search criteria to geographical locations of Whole Foods locations in a database to identify the Whole Foods locations geographically closest to the user-entered search criteria.
b. converting said coordinates	The Whole Foods Store Locator performs the step of "converting said coordinates to an appropriately proportionate representation on said computer."

U.S. Pat No. 6,091,956	Whole Foods Store Locator

to an appropriately proportionate representation on said computer, and	The Whole Foods Store Locator returns a map according to the zoom level specified for the map to be displayed. For example, the Whole Foods Store Locator uses the following Javascript code to return a map according to a predetermined zoom level.
	
	"function loadMap(){
	directionsDisplay = new google.maps.DirectionsRenderer();
	
	var latlng = new google.maps.LatLng(storeLat,storeLon);
	var myOptions = {
	zoom: 12,
	center: latlng,
	mapTypeControlOptions: {style: google.maps.MapTypeControlStyle.DROPDOWN_MENU},
	mapTypeId: google.maps.MapTypeId.ROADMAP
	};"
	
	The Whole Foods Store Locator also returns a map according to a predetermined size. For example, the exemplary code below defines the map size:
	
	"#map_container{
	background:url(../images/store_map_clean.png) no-repeat scroll top left;
	float:left;
	width:960px;
	height:700px;
	overflow:hidden;
	display:block;
	"
	
	Based on the layout of the Whole Foods Store Locator, the zoom level and size each provide for the display of an appropriately proportionate representation.

c. displaying selectably scalably said items on said computer whereby said user may quickly	The Whole Foods Store Locator performs the step of "displaying selectably scalably said items on said computer whereby said user may quickly receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information." The Whole Foods Store Locator displays a map image based on the user-entered search criteria. The scale (or zoom) of the map is initialized to a predetermined value but a different scale map may be selected by the user. For example, a different scale may be performed by selecting

U.S. Pat No. 6,091,956	Whole Foods Store Locator
receive and display timely situation information mapped in the context of spatial information, including appropriate to a geographical or other area, in which said mappable hypertext items are quickly received, mapped, and optionally executably selected by said user to provide additional of said situation information or received, stored, and transmitted by a provider of said situation information.	the "+" or "-" symbols displayed on the left side of the map. Selecting the "+" symbol results in zooming in on the displayed map, whereas selecting the "-" symbol results in zooming out of the displayed map. The map image displays hypertext items corresponding to the user-entered search criteria. Identification of Whole Foods locations based upon the user-entered search criteria constitutes timely situation information, as the locations displayed are presumably current and/or the locations are geographically relevant (e.g., closest in distance amongst all of the locations) to the user-entered search criteria. Further, each of the locations are displayed on a map, and are thus, "mapped in the context of spatial information, including appropriate to a geographical or other area." The mappable hyptertext items, e.g., the markers representing the locations, are received, mapped and optionally executable to provide additional situation information. The markers are received and displayed on the map according to the coordinates associated with each location. Each marker may also be "optionally executable" because when the marker is clicked, an event (e.g., a JavaScript event) associated with the marker is executed, providing additional situation information (e.g., address, phone number, directions, hours, etc.). Accordingly, the "additional situation information" is the information displayed in response to clicking a given marker.

U.S. Pat No. 6,091,956	Whole Foods Store Locator